



Virginia
Regulatory
Town Hall

Final Regulation Agency Background Document

Agency Name:	Board of Professional Counseling, Dept. of Health Professions
VAC Chapter Number:	18 VAC 115-20-10 et seq., 18 VAC 115-50-10 et seq., and 18 VAC 115-60-10 et seq.
Regulation Title:	Regulations Governing the Practice of Professional Counseling; Regulations Governing the Practice of Marriage and Family Therapist; Regulations Governing the Practice of Substance Treatment Practitioners
Action Title:	Continuing Competency Requirements
Date:	June 23, 2004

Please refer to the Administrative Process Act (§ 9-6.14:9.1 *et seq.* of the *Code of Virginia*), Executive Order Twenty-Five (98), Executive Order Fifty-Eight (99), and the *Virginia Register Form, Style and Procedure Manual* for more information and other materials required to be submitted in the final regulatory action package.

Summary

Please provide a brief summary of the new regulation, amendments to an existing regulation, or the regulation being repealed. There is no need to state each provision or amendment; instead give a summary of the regulatory action. If applicable, generally describe the existing regulation. Do not restate the regulation or the purpose and intent of the regulation in the summary. Rather, alert the reader to all substantive matters or changes contained in the proposed new regulation, amendments to an existing regulation, or the regulation being repealed. Please briefly and generally summarize any substantive changes made since the proposed action was published.

In compliance with a statutory mandate, the Board has adopted continuing competency requirements for the renewal of licensure as a Professional Counselor, Marriage and Family Therapist, and Substance Abuse Treatment Practitioner. The Board has adopted a requirement of 20 hours of continuing competency coursework per year, including a provision for an inactive licensure status to accommodate individuals who are not actively practicing and who may be unable to meet the continuing competency requirements.

Changes Made Since the Proposed Stage

Please detail any changes, other than strictly editorial changes, made to the text of the proposed regulation since its publication. Please provide citations of the sections of the proposed regulation that have been altered since the proposed stage and a statement of the purpose of each change.

The Board made no changes to the proposed regulatory language.

Statement of Final Agency Action

Please provide a statement of the final action taken by the agency: including the date the action was taken, the name of the agency taking the action, and the title of the regulation.

On June 4, 2004, the Board of Professional Counseling adopted final amendments to 18 VAC 115-20-10 et seq., Regulations Governing the Practice of Professional Counseling; 18 VAC 115-50-10 et seq., Regulations Governing the Practice of Marriage and Family Therapy; and 18 VAC 115-60-10 et seq., Regulations Governing the Practice of Substance Abuse Treatment Practitioners in order to implement statutory requirements for continuing competency as a condition of renewal.

Basis

Please identify the state and/or federal source of legal authority to promulgate the regulation. The discussion of this statutory authority should: 1) describe its scope and the extent to which it is mandatory or discretionary; and 2) include a brief statement relating the content of the statutory authority to the specific regulation. In addition, where applicable, please describe the extent to which proposed changes exceed federal minimum requirements. Full citations of legal authority and, if available, web site addresses for locating the text of the cited authority, shall be provided. If the final text differs from that of the proposed, please state that the Office of the Attorney General has certified that the agency has the statutory authority to promulgate the final regulation and that it comports with applicable state and/or federal law

Chapter 430 of the 2002 Acts of the Assembly adds section 54.1-3505.1 which mandates that the Board of Counseling establish requirements for evidence of continued competency as a condition of renewal of license.

§ 54.1-3505.1. Continued competency requirements

The Board shall promulgate regulations establishing requirements for evidence of continued competency as a condition of renewal of a license under the provisions of this chapter. The Board may approve persons who provide or accredit continuing education programs in order to accomplish the purposes of this section. The Board shall have the authority to grant exemptions or waivers or to reduce the number of continuing education hours required in cases of certified illness or undue hardship.

The Board is authorized under § 54.1-103 to specify additional training or conditions for renewal of a license.

§ 54.1-103. Additional training of regulated persons; reciprocity; endorsement

- A. *The regulatory boards within the Department of Professional and Occupational Regulation and the Department of Health Professions may promulgate regulations specifying additional training or conditions for individuals seeking certification or licensure, or for the renewal of certificates or licenses.*
- B. *The regulatory boards may enter into agreements with other jurisdictions for the recognition of certificates and licenses issued by other jurisdictions.*
- C. *The regulatory boards are authorized to promulgate regulations recognizing licenses or certificates issued by other states, the District of Columbia, or any territory or possession of the United States as full or partial fulfillment of qualifications for licensure or certification in the Commonwealth.*

Section 54.1-2400 establishes duties of health regulatory boards to establish necessary qualifications for registration, certification or licensure, to ensure the competence and integrity of regulated practitioners, to examine applicants, to establish renewal schedules, to administer fees to cover the administrative expenses of the regulatory program, to take disciplinary action for violations of law and regulations and to establish requirements for an inactive licensure status.

§ 54.1-2400. General powers and duties of health regulatory boards.

The general powers and duties of health regulatory boards shall be:

- 1. To establish the qualifications for registration, certification or licensure in accordance with the applicable law which are necessary to ensure competence and integrity to engage in the regulated professions.*
- 2. To examine or cause to be examined applicants for certification or licensure. Unless otherwise required by law, examinations shall be administered in writing or shall be a demonstration of manual skills.*
- 3. To register, certify or license qualified applicants as practitioners of the particular profession or professions regulated by such board.*
- 4. To establish schedules for renewals of registration, certification and licensure.*
- 5. To levy and collect fees for application processing, examination, registration, certification or licensure and renewal that are sufficient to cover all expenses for the administration and operation of the Department of Health Professions, the Board of Health Professions and the health regulatory boards.*
- 6. To promulgate regulations in accordance with the Administrative Process Act (§ 2.2-4000 et seq.) which are reasonable and necessary to administer effectively the regulatory system. Such regulations shall not conflict with the purposes and intent of this chapter or of Chapter 1 (§ [54.1-100](#) et seq.) and Chapter 25 (§ [54.1-2500](#) et seq.) of this title.*

7. To revoke, suspend, restrict, or refuse to issue or renew a registration, certificate or license which such board has authority to issue for causes enumerated in applicable law and regulations.

8. To appoint designees from their membership or immediate staff to coordinate with the Intervention Program Committee and to implement, as is necessary, the provisions of Chapter 25.1 (§ [54.1-2515](#) et seq.) of this title. Each health regulatory board shall appoint one such designee.

9. To take appropriate disciplinary action for violations of applicable law and regulations.

10. To appoint a special conference committee, composed of not less than two members of a health regulatory board, to act in accordance with § [2.2-4019](#) upon receipt of information that a practitioner of the appropriate board may be subject to disciplinary action. The special conference committee may (i) exonerate the practitioner; (ii) reinstate the practitioner; (iii) place the practitioner on probation with such terms as it may deem appropriate; (iv) reprimand the practitioner; (v) modify a previous order; and (vi) impose a monetary penalty pursuant to § [54.1-2401](#). The order of the special conference committee shall become final thirty days after service of the order unless a written request to the board for a hearing is received within such time. If service of the decision to a party is accomplished by mail, three days shall be added to the thirty-day period. Upon receiving a timely written request for a hearing, the board or a panel of the board shall then proceed with a hearing as provided in § [2.2-4020](#), and the action of the committee shall be vacated. This subdivision shall not be construed to affect the authority or procedures of the Boards of Medicine and Nursing pursuant to §§ [54.1-2919](#) and [54.1-3010](#).

11. To convene, at their discretion, a panel consisting of at least five board members or, if a quorum of the board is less than five members, consisting of a quorum of the members to conduct formal proceedings pursuant to § [2.2-4020](#), decide the case, and issue a final agency case decision. Any decision rendered by majority vote of such panel shall have the same effect as if made by the full board and shall be subject to court review in accordance with the Administrative Process Act. No member who participates in an informal proceeding conducted in accordance with § [2.2-4019](#) shall serve on a panel conducting formal proceedings pursuant to § [2.2-4020](#) to consider the same matter.

12. To issue inactive licenses or certificates and promulgate regulations to carry out such purpose. Such regulations shall include, but not be limited to, the qualifications, renewal fees, and conditions for reactivation of licenses or certificates.

The web site address for located the text of these statutes is <http://www.leg1.state.va.us>.

The Office of the Assistant Attorney General has certified by letter that the Board has the statutory authority to promulgate the proposed regulation and that it comports with applicable state and/or federal law.

Purpose

Please provide a statement explaining the need for the new or amended regulation. This statement must include the rationale or justification of the final regulatory action and detail the specific reasons it is essential to protect the health, safety or welfare of citizens. A statement of a general nature is not acceptable, particular rationales must be explicitly discussed. Please include a discussion of the goals of the proposal and the problems the proposal is intended to solve.

Chapter 430 of the 2002 Acts of the Assembly provides for a specific mandate in § 54.1-3505.1 for the Board to develop continuing competency requirements for licensure renewal. In compliance with this mandate, the Board adopted a proposed regulation setting forth an hour requirement, approved categories of activities, approved providers and instructions for documentation of compliance. The Board has also included a provision for an inactive licensure status to allow practitioners who are not actively practicing professional counseling, marriage and family therapy; and substance abuse treatment in Virginia to defer the continuing competency requirement until they reactivate the license.

In developing the requirements, the Board contemplated the financial and time burdens the requirements might have on licensees, and at the same time strove to develop a meaningful standard that would assure continued competency to protect the public health, safety and welfare. For alternatives the Board considered the continuing education requirements of other state counseling boards, other professional counseling organizations and associations, as well as the requirements of other boards in the Department of Health Professions. The Board also considered public comment regarding the content of the training. The Board considered a range of hours from 10 to 40 per year, and selected 20 hours as a reasonable number of hours compared with the requirements in other states.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. Please note that a more detailed discussion is required under the statement of the regulatory action's detail.

The Board is recommending amendments to its regulations to comply with a 2002 General Assembly mandate for continuing competency essential to protect the health, safety, and welfare of the public who receive counseling services from licensed practitioners. In complying with the mandate to establish continuing competency requirements, the Board has determined what types of education would be most meaningful for each of the licensure categories it regulates, while considering the cost and availability of education to licensees in a wide variety of practice situations in both metropolitan and rural areas of the state.

The statute also authorized the Board to approve and register providers of continuing competency/education meeting certain criteria. The Board had to determine the optimal method for ensuring the credibility of providers and the quality of their programs without increasing the cost and administrative burden of operating the licensure program.

Issues

Please provide a statement identifying the issues associated with the final regulatory action. The term "issues" means: 1) the advantages and disadvantages to the public of implementing the new provisions; 2) the advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters

of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, please include a sentence to that effect.

1) The primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions:

Since the public often relies on the professional judgment of professional counselors, marriage and family therapists, and substance abuse treatment practitioners continued education of practice would be advantageous to the public. There are no disadvantages to the public or to individual businesses, which are not affected by these regulations.

2) The primary advantages and disadvantages to the agency or the Commonwealth:

The fee structure set in regulation is intended to ensure that costs related to specific activities are borne by the applicants or certificate holders. Agencies of the Commonwealth that offer behavioral health assessment and treatment may benefit from having licensed providers who have more specific training for their job.

The Board will incur additional costs to monitor compliance of licensees, and to hold additional disciplinary hearings for individuals who do not comply with the requirement. With the passage of HB 1441 (2003 General Assembly) the Board will be able to resolve some cases of noncompliance with a "Confidential Consent Agreement," thereby keeping the number of disciplinary proceedings low and the additional costs at reasonable limits.

Public Comment

Please summarize all public comment received during the public comment period and provide the agency response. If no public comment was received, please include a statement indicating that fact.

Proposed regulations were published in the Virginia Register of Regulations on December 12, 2003. Public comment was requested for a 60-day period ending February 27, 2004; during that period written comment was received. The comments are summarized as follows:

July 1, 2004 is too soon to begin a new regulation and that July 1, 2005 would be a more reasonable date to begin.

Board response: *The date to begin this new regulation is yet to be determined, and cannot be done until all the steps to adopt the regulation have been completed. However, licensees will have a minimum of 1 year notification of the need to begin accumulating their continuing competency hours.*

Maintenance of national board certification should count as part of the continuing competency regulations. Recertification requires either re-taking the board examination or accruing

competency credits in a manner similar to that proposed by the Board of Counseling. As such, recertification through a national board is sufficient proof of continuing professional competency and therefore duplicative of the process proposed by 18 VAC 115-20.

Board response: *The proposed regulation was developed to interface with continuing competency requirements for national certification in order to facilitate the process for LPC's to be able to achieve both requirements with the same documentation. Unfortunately the cycle for licensure renewal does not coincide with renewal cycles for other certifying bodies and so it was not possible to simply allow national certification standing to be "proof" of continuing competency. Licensure renewal is every two years and submission of continuing competency requirements have to run on the same two-year cycle. However, achieving these continuing competency requirements will certainly facilitate the renewal process for some certifying organizations.*

The Virginia Counselors Association (VCA), representing over 2,000 Virginia counselors in a variety of practice settings, supports the proposed continuing competency regulations (CCR) for Professional Counselors without exception. The VCA views the establishment of authority for the Board of Counseling to develop CCR as an issue of professional parity as well as important to ensure the continued protection of the public.

Board response: *Thank you for your taking the time to comment on the proposed regulations for continuing competency, the Board appreciates support of the Virginia Counselors Association.*

VAADAC, the addiction counseling association, took this opportunity to voice support of the effort to amend the current regulations governing the practice of counseling to include mandatory continuing education requirements for the renewal of credentials. VAADAC offered three suggestions for consideration:

First, that the number of required hour be increased to 24;

Second, that the regulations include a mandatory direct attendance (non-distance learning) ethics training/workshop of a minimum of 4 hours; and

Third, that the mandatory CEU requirement be applied to the Certified Substance Abuse Counselor credentials.

Board Response: *In order to provide for the needs of those licensed by this Board who live and work in the more rural areas of the Commonwealth, the Board decided that those distance learning opportunities which qualify under the proposed regulations, were appropriate sources of training. While the Board agrees that understanding and applying current ethical practices is a protection of the public issue, there is no evidence to support that distance-learning training in ethics is not effective. However, professional organizations should be encouraged to consider making face- to-face ethics training opportunities available to their members as part of their membership services.*

Chapter 430 of the 2002 Acts of the Assembly provides for a specific mandate in § 54.1-3505.1 for the Board to develop continuing competency requirements for licensure renewal. Section 54.1-3505.1 specifies that the Board shall promulgate regulations establishing requirements for evidence of continued competency as a condition of renewal of a license under the provisions of this chapter. It does not provide authority to promulgate similar regulation for renewal of certificates.

A Public Hearing before the Board was held on February 13, 2004, at which time the following comments were made:

One person, having not seen the regulatory language prior to the hearing, was concerned as to what types of courses would be acceptable as well as what organizations would be acceptable as providers.

Three persons representing the Virginia Counselors Association (VCA) expressed their support for continuing education requirements as a condition of licensure renewal.

One person representing the District 19 Community Service Board (CSB) spoke about the concerns at CSB's as to whether many of the trainings and in-services currently occurring would count toward continuing education credit.

One person representing the Virginia Association of Clinical Counselors (VACC) expressed concern that a portion of the hours, preferably the ethics portion should be obtained in a face-to-face situation. He pointed out that by looking at the Boards' newsletter you can see that many of the disciplinary actions are for boundary or practice type violations. VACC believes that the amount and seriousness of these violations necessitate a serious review of the ethics of practice. And that a thorough review of ethics cannot be accomplished by independent or on-line study.

Board Response: *The Board appreciates all those who came to the public comment meeting and their dedication to the profession.*

The proposed regulations require 20 contact hours of continuing education over each year of the two year license renewal cycle. The usage of contact hours as opposed to Continuing Education Units (CEU's) is consistent with most national certifications and should make it easier for those licensed under this Board to fulfill continuing competency requirements for both. Continuing Education Units can be computed to contact hours for the purpose of license renewal.

The range of acceptable providers for continuing competency training is very broad in order should facilitate the process of obtaining the required contact hours for licensees across the Commonwealth. Continuing competency training opportunities provided by state agencies for their licensed personnel should meet the requirements as set forth in the proposed regulations.

In order to provide for the needs of those licensed by this Board who live and work in the more rural areas of the Commonwealth, the Board decided that those distance learning opportunities which qualify under the proposed regulations, were appropriate sources of training. While the Board agrees that understanding and applying current ethical practices is a protection of the public issue, there is no evidence to support that distance-learning training in ethics is not

effective. However, professional organizations should be encouraged to consider making face-to-face ethics training opportunities available to their members as part of their membership services.

Detail of Changes

Please detail any changes, other than strictly editorial changes, that are being proposed. Please detail new substantive provisions, all substantive changes to existing sections, or both where appropriate. This statement should provide a section-by-section description - or crosswalk - of changes implemented by the proposed regulatory action. Include citations to the specific sections of an existing regulation being amended and explain the consequences of the changes.

CHAPTER 20.

REGULATIONS GOVERNING THE PRACTICE OF PROFESSIONAL COUNSELING.

PART I.

GENERAL PROVISIONS

18 VAC 115-20-20. Fees required by the board.

- The Board amended this section by including a fee for inactive annual licensure renewal.

PART IV.

LICENSURE RENEWAL; REINSTATEMENT.

18 VAC 115-20-100. Annual Renewal of licensure.

- The Board amended this section by including a requirement to document continuing education and adding inactive licensure status. In order to allow a full renewal period for licensees to obtain the required hours, compliance will not be required to be documented until after the 2006 renewal date. The inactive status may provide an exemption to the continuing education requirement for individuals who, for reasons such as illness, military service or relocation to another state or country, or are not actively practicing professional counseling in Virginia.

18 VAC 115-20-105. Continued competency requirements for renewal of a license.

- This new section provides that licensees will begin accruing the hours following renewal in 2005. This section also sets forth a minimum of 20 hours of continuing competency, a minimum of two of these hours shall be in courses that emphasize the ethics, standards of practice or laws governing behavioral science professions in Virginia.
- The regulation provides for the exemption or extension of the requirement for special circumstances. This section also provides that individuals dually licensed by this Board will not be required to obtain continuing competency for each license.

18 VAC 115-20-106. Continuing competency activity criteria.

- This new section specifies that the training must be relevant to the scope of practice for the area of licensure held and that the continuing competency activities must focus on increasing knowledge or skills in the behavioral science profession. This new section also cites certain types of institutions and organizations that the Board will recognize as approved providers of continuing competency. Likewise, this new section also cites certain types of specific formally organized and individual professional activities that the Board may consider acceptable for continuing competency.

18 VAC 115-20-107. Documenting compliance with continuing competency requirements.

- This new section outlines the type of documentation that the Board will accept when monitoring compliance of licensees and sets forth a maintenance requirement for that documentation. This new section specifies that continuing competency hours required by a disciplinary order shall not be used to satisfy renewal requirements.

18 VAC 115-20-110. Late renewal; reinstatement.

- The Board amended this section to establish a requirement for documentation of continued competency hours for individuals who are reinstating either a lapsed or inactive license.

**PART VI.
STANDARDS OF PRACTICE
UNPROFESSIONAL CONDUCT, DISCIPLINARY ACTIONS;
REINSTATEMENT**

18 VAC 115-20-140. Grounds for revocation, suspension, probation, reprimand, censure, or denial of renewal of license.

- The Board amended this section to allow for the disciplinary action of licensees who fail to comply with continuing competency requirements set forth in this chapter.

CHAPTER 50.

REGULATIONS GOVERNING THE PRACTICE OF MARRIAGE AND FAMILY THERAPY.

**PART I.
GENERAL PROVISIONS.**

18 VAC 115-50-20. Fees.

- The Board amended this section by including a fee for inactive annual licensure renewal.

**PART IV.
RENEWAL AND REINSTATEMENT OF LICENSE.**

18 VAC 115-50-90. Annual renewal of license.

- The Board amended this section by including a requirement to document continuing education and adding inactive licensure status. In order to allow a full renewal period for licensees to obtain the required hours, compliance will not be required to be documented until after the 2006 renewal date. The inactive status may provide an exemption to the continuing education requirement for individuals who, for reasons such as illness, family leave or relocation to another state or country, or are not actively practicing marriage and family therapy in Virginia.

18 VAC 115-50-95. Continued competency requirements for renewal of license.

- This new section provides that licensees will begin accruing the hours following renewal in 2005. This section also sets forth a minimum of 20 hours of continuing competency; a

minimum of two of these hours shall be in courses that emphasize the ethics, standards of practice or laws governing behavioral science professions in Virginia.

- The regulation provides for the exemption or extension of the requirement for special circumstances. This section also provides that individuals dually licensed by this Board will not be required to obtain continuing competency for each license.

18 VAC 115-50-96. Continuing competency activity criteria.

- This new section specifies that the training must be relevant to the scope of practice for the area of licensure held and that the continuing competency activities must focus on increasing knowledge or skills in the behavioral science profession. This new section also cites certain types of institutions and organizations that the Board will recognize as approved providers of continuing competency. Likewise, this new section also cites certain types of specific formally organized and individual professional activities that the Board may consider acceptable for continuing competency.

18 VAC 115-50-97. Documenting compliance with continuing competency requirements.

- This new section outlines the type of documentation that the Board will accept when monitoring compliance of licensees and sets forth a maintenance requirement for that documentation. This new section specifies that continuing competency hours required by a disciplinary order shall not be used to satisfy renewal requirements.

18 VAC 115-50-100. Late renewal, reinstatement.

- The Board amended this section to establish a requirement for documentation of continued competency hours for individuals who are reinstating either a lapsed or inactive license.

**PART VI
DISCIPLINARY ACTION**

18 VAC 115-50-120. Disciplinary action.

- The Board amended this section to allow for the disciplinary action of licensees who fail to comply with continuing competency requirements set forth in this chapter.

CHAPTER 60.

**REGULATIONS GOVERNING THE PRACTICE OF SUBSTANCE ABUSE
TREATMENT PRACTITIONERS.**

**PART I.
GENERAL PROVISIONS.**

18 VAC 115-60-20. Fees required by the board.

- The Board amended this section by including a fee for inactive annual licensure renewal.

**PART IV.
LICENSE RENEWAL; REINSTATEMENT.**

18 VAC 115-60-110. Renewal of licensure.

- The Board amended this section by including a requirement to document continuing education and adding inactive licensure status. In order to allow a full renewal period for licensees to obtain the required hours, compliance will not be required to be documented until after the 2005 renewal date. The inactive status may provide an exemption to the continuing education requirement for individuals who, for reasons such as illness, family leave or relocation to another state or country, or are not actively practicing marriage and substance abuse treatment practitioners in Virginia.

18 VAC 115-60-115. Continued competency requirements for renewal of a license.

- This new section provides that licensees will begin accruing the hours following renewal in 2005. This section also sets forth a minimum of 20 hours of continuing competency; a minimum of two of these hours shall be in courses that emphasize the ethics, standards of practice or laws governing behavioral science professions in Virginia.
- The regulation provides for the exemption or extension of the requirement for special circumstances. This section also provides that individuals dually licensed by this Board will not be required to obtain continuing competency for each license.

18 VAC 115-60-116. Continuing competency activity criteria.

- This new section specifies that the training must be relevant to the scope of practice for the area of licensure held and that the continuing competency activities must focus on increasing knowledge or skills in the behavioral science profession. This new section also cites certain types of institutions and organizations that the Board will recognize as approved providers of continuing competency. Likewise, this new section also cites

certain types of specific formally organized and individual professional activities that the Board may consider acceptable for continuing competency.

18 VAC 115-60-117. Documenting compliance with continuing competency requirements.

- This new section outlines the type of documentation that the Board will accept when monitoring compliance of licensees and sets forth a maintenance requirement for that documentation. This new section specifies that continuing competency hours required by a disciplinary order shall not be used to satisfy renewal requirements.

18 VAC 115-60-120. Late renewal; reinstatement.

- The Board amended this section to establish a requirement for documentation of continued competency hours for individuals who are reinstating either a lapsed or inactive license.

**PART V.
STANDARDS OF PRACTICE
UNPROFESSIONAL CONDUCT; DISCIPLINARY ACTIONS;
REINSTATEMENT**

18 VAC 115-60-140. Grounds for revocation, suspension, probation, reprimand, censure, or denial of renewal of license.

- The Board amended this section to allow for the disciplinary action of licensees who fail to comply with continuing competency requirements set forth in this chapter.

Family Impact Statement

Please provide an analysis of the regulatory action that assesses the impact on the institution of the family and family stability including the extent to which the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

The amendments will have no impact on the authority and rights of parents in the education, nurturing or supervision of their children. They may encourage increased confidence for licensees who obtain additional training which they may not have otherwise pursued. The amendments may enhance the marital commitment for clients who may benefit from a practitioner who has chosen training in family systems theory. Disposable income of practitioners who are required to obtain the training may decrease slightly depending on the type of training selected.